

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
Watkins C. Dweh : No. 19-10432-JKF
Debtor : :

ANSWER TO MOTION OF PENNSYLVANIA HOUSING FINANCE AGENCY
FOR RELIEF FROM THE AUTOMATIC STAY

Debtor, by Attorney David M. Offen respectfully submits the following:

The debtor admits that some payments have not been made on time but denies that payments were not made and will provide proof of the same. The debtor avers he should only owe for May 2020.

WHEREFORE, the Debtor respectfully requests that the Movant's Motion for Relief be DENIED.

Respectfully submitted,

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 5/20/20

CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Rebecca Solarz on behalf of U.S. Bank National Association
bklawgroup@kmlawgroup.com

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 5/20/20